

Monte J. White & Associates, P.C.
Monte J. White, State Bar No. 00785232
1106 Brook Ave
Wichita Falls TX 76301
(940)-723-0099
(940)-723-0096 Fax

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE: § CASE NO.09-70427-HDH
Janet Elaine McGinnis §
§ CHAPTER 13
§
DEBTOR §

MOTION TO WAIVE WAGE DIRECTIVE

NOW COMES, Janet Elaine McGinnis, in the above-styled and numbered cause, and files this Motion to Waive Wage Directive on behalf of Debtor, and in support thereof would respectfully show unto the Court as follows:

1. Debtor filed a Chapter 13 Bankruptcy on 8/25/2009.
2. Debtor is asking the Court to waive the requirement of payroll deduction for her Chapter 13 payment. Debtor is employed by Aeropostale, Inc., as a District Manager. She is responsible for inventory, payroll and budgets for several stores. She feels her position would be in danger if her employer knew she filed bankruptcy.

WHEREFORE, Debtor Janet Elaine McGinnis, prays that the Motion to Waive Wage Directive filed on Behalf of Debtor be granted and for such other and further relief to which said Debtor may be entitled, either at law or in equity.

Respectfully submitted,

/s/Monte J. White, SBN 00785232
Attorney for Debtor

CERTIFICATE OF CONFERENCE

On October 20, 2009, certifies that the Office of Monte J. White & Associates, P.C., contacted Marc McBeath, Counsel for the Chapter 13 Trustee and was advised that the Trustee neither opposes or agrees the motion.

/s/Monte J. White
Attorney for Debtor

CERTIFICATE OF SERVICE

I, Monte J. White, do hereby certify that I served a true and correct copy of the foregoing Motion to the parties listed on the following parties by ECF and/or regular mail on October 22, 2009.

CHAPTER 13 TRUSTEE

Walter O'Cheskey
6308 Iola Ave
Lubbock, TX 79424

DEBTOR

Janet Elaine McGinnis
1712 Speedway Ave.
Wichita Falls, TX 76301

U.S. TRUSTEE

William T. Neary
1100 Commerce St., Rm 9SC60
Dallas, TX 75242

/s/Monte J. White
Attorney for Debtor